

## AMENDMENT TO THE CLAIMS

Replace the claims with the following rewritten listing.

1. (Cancelled)

2. (Previously Presented) A surge absorber without chips, comprising:

a pair of lead terminals, each having a lead portion and a broadened tip forming a discharge electrode, at least one broadened tip having a projected or patterned surface;  
a sealing spacer fitted and fixed on the lead portion of each said lead terminal; and  
a one piece cylindrical housing;

wherein said pair of lead terminals and said sealing spacers fixed thereon are configured to be inserted from open ends on both sides of said housing into an interior of said housing, and the two sealing spacers are welded on an inside wall at said interior of said housing to air tightly seal said housing while the discharge electrodes are held in said housing facing one another with a predetermined distance therebetween; and

wherein the sealing spacers, with lead terminals fixed thereto, are adjustable within the cylindrical housing before said being fixed air tightly thereto such that the distance between the discharge electrodes may be varied and set as desired.

3. – 7. (Cancelled)

8. (Previously Presented) The surge absorber without chips defined in Claim 2, wherein:

an air chamber provided in the housing is filled with clean, dry air, or a mixed gas comprising clean, dry air and an insert gas or hydrogen gas.

9. (Previously Presented) The surge absorber without chips defined in Claim 2, wherein

said sealing spacers have a shape of a sphere or a cylinder with a central fitting through-hole in which the lead portions of the lead terminals are inserted.

10. (Previously Presented) The surge absorber without chips defined in Claim 2, wherein

the lead terminals are formed of Dumet wires.

11. (Previously Presented) The surge absorber without chips defined in Claim 2, wherein the lead terminals are formed of combined lead wires in which portions that weld with the sealing spacers are composed of Dumet wires.

12. (Previously Presented) The surge absorber without chips defined in Claim 8, wherein: the clean, dry air sealed in the air chamber has a relative humidity of 5% or less, and a degree of cleanliness of 99.99% (0.5 $\mu$ mDOP), which is higher than the degree of cleanliness obtained through filtering normal air.

13. – 16. (Cancelled)

17. (Previously Presented) The surge absorber without chips defined in claim 2, wherein: the projected surface comprises a protrusion having a substantially conical shape extending from the broadened tip in a direction of a longitudinal axis of the lead portion.

18. (Previously Presented) The surge absorber without chips defined in claim 2, wherein: the projected surface comprises a protruding portion extending from an edge of the broadened tip, the protruding portion delimiting a conical cavity in the broadened tip.

19. (Previously Presented) The surge absorber without chips defined in claim 2, wherein: the projected surface comprises a semi-spherical protrusion extending from the broadened tip.

20. (Previously Presented) The surge absorber without chips defined in claim 2, wherein: the patterned surface comprises grooves forming a grid pattern on the broadened tip.